

## REMARKS

Applicants respectfully request reconsideration of this application as amended. Claims 1, 10, 16 and 20 have been amended. Claims 6-9 have previously been canceled. No new claims have been added. Therefore, claims 1-5 and 10-23 are now presented for examination. The following remarks are in response to the final Office Action mailed August 29, 2005.

### 35 U.S.C. § 103 Rejection

Claims 1-23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Newman et al., U.S. Patent No. 6,154,600 (“Newman”) in view of Liaguno et al., U.S. Patent No. 5,729,741 (“Liaguno”).

Applicants respectfully submit that Newman discloses “[a] non-linear editing system for home audio and video applications.” (Abstract). Newman further discloses that the editing system uses “a graphical user interface [GUI] useful for the capture of hypermedia. In capture mode, the capture GUI preferably *includes a shot tab 404 [and] displaying icons 406 representing previously captured clips*. The capture GUI likewise includes a display window 408 to display an image from a clip referenced by a selected icon 410.” (col. 14, lines 40-48; emphasis provided). A user is then able to “*manipulate clips by enhancing them with graphics, text and audio annotations*.” (col. 14, lines 18-19; emphasis provided). The system also includes the use of hypermedia. “*The term hypermedia refers to the integration of text, graphics, sound, video, and other data, or combination into a primary associative system for information presentation, storage, and retrieval*. Hypermedia environments enable users to make associations between topics. “[A] hypermedia presentation on navigation . . . *include[s] associations, or links, to such*

*topics as astronomy, bird migration, geography, satellites and radar.*” (col. 5, lines 46-56; emphasis provided).

Liaguno discloses “[a]n integrated media image information storage and retrieval system [that] processes information supplied by different types of media.” (Abstract, lines 1-3).

In contrast, claim 1, in pertinent part, recites “receiving a first audio signal containing annotations, wherein each annotation is preceded by a keyword to specify a type of that annotation . . . and converting the annotations into searchable annotations organized as hierarchical shot clusters using a voice-to-text conversion system.” (emphasis provided). Applicants respectfully submit that Newman does not teach or reasonably suggest these features. Newman discloses manipulating clips by enhancing them with audio annotations (col. 14, lines 18-19); however, Newman does not teach or reasonably suggest that “each annotation is preceded by a keyword to specify a type of that annotation” as recited by claim 1. (emphasis provided).

In addition, Applicants respectfully submit that Newman does not teach or reasonably suggest “converting the annotations into searchable annotations organized as hierarchical shot clusters using a voice-to-text conversion system” as recited by claim 1. (emphasis provided). In a final Office Action, mailed August 29, 2005, the Examiner acknowledges that “Newman does not specifically disclose converting the annotations into searchable annotations using a voice-to-text conversion system.” (final Office Action, mailed August 29, 2005, page 3, paragraph 2, lines 17-18). The Examiner instead relies on the manipulation of hypermedia as teaching converting the annotations into searchable annotations organized as hierarchical shot clusters using a voice-to-text conversion system, as recited by claim 1. Nonetheless, hypermedia simply enables users

to make associations between topics such as astronomy, bird migration, geography, satellites and radar (col. 5, lines 46-56), which is not the same as converting the annotations into searchable annotations organized as hierarchical shot clusters using a voice-to-text conversion system, as recited by claim 1.

Additionally, Liaguno does not teach or reasonably suggest “receiving a first audio signal containing annotations, wherein each annotation is preceded by a keyword to specify a type of that annotation . . . and converting the annotations into searchable annotations organized as hierarchical shot clusters using a voice-to-text conversion system” as recited by claim 1. (emphasis provided). Therefore, Applicants respectfully submit that neither Newman nor Liaguno, individually or combined, teach or reasonably suggest “receiving a first audio signal containing annotations, wherein each annotation is preceded by a keyword to specify a type of that annotation . . . and converting the annotations into searchable annotations organized as hierarchical shot clusters using a voice-to-text conversion system.” (emphasis provided). Accordingly, Applicants respectfully request the withdrawal of the rejection to claim 1 and its dependent claims.

Claims 10, 16 and 20 contain limitations similar to those of claims 1. Accordingly, Applicants respectfully request the withdrawal of the rejection of claims 10, 16 and 20 and their dependent claims.

### **Conclusion**

In light of the foregoing, reconsideration and allowance of the claims is hereby earnestly requested.

### **Invitation for a Telephone Interview**

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

### **Request for an Extension of Time**

Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.


### **Charge our Deposit Account**

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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